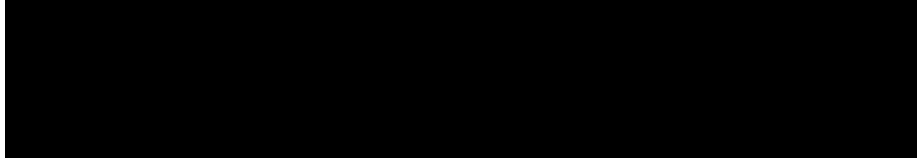


# Exhibit C



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**From:** Lo, Shon  
**Sent:** Friday, June 2, 2023 11:30 AM  
**To:** O'Quinn, Ryan; Dudash, Amy M.; Williamson, Amanda S.; Betti, Ph.D., Christopher J.; Venegas, Ph.D., Krista Vink; Kraeutler, Eric; Doukas, Maria E.; Morishita, Jitsuro; Sikora, Michael T.; Miller, Zachary D.; Hache, Ph.D., Guylaine; NS District Court  
**Cc:** jblumenfeld@morrisnichols.com; mdellinger@mnat.com; Lipton, Alissa; Lipsey, Charles; Flibbert, Michael; Clay, Aaron; Kozikowski, John; McCorquindale, J. Derek; Raich, William; Lee, Yoonjin; Kim, Yoonhee  
**Subject:** RE: Nippon Shinyaku, Ltd. v. Sarepta Therapeutics, Inc., No. 1:21-cv-01015-LPS - Disclosure of Experts

Ryan,

We are not trying to play word games. We do not know what Sarepta regards to be confidential information in Dr. Wood's possession, hence the "to our knowledge." We understand that approximately [REDACTED] have passed since [REDACTED], hence it is unsurprising if he might not recall the details of any confidential information he received during or before that time.

For avoidance of doubt: we expressly informed Dr. Wood that we are not seeking and instructed him that he should not disclose any confidential information he received from Sarepta to us or NS. Dr. Wood indicated that he understood our instruction, was not aware of any confidential Sarepta information in his possession, and agreed not disclose Sarepta's confidential information to the extent that any such information existed. Dr. Wood's counsel is:

Katherine J. Michon  
Hartley Michon Robb Hannon LLP  
155 Seaport Boulevard, 2nd Floor  
Boston, MA 02210-2698  
Main: (617) 723-8000  
kmichon@hmrhlaw.com

Aside from your concerns regarding unauthorized disclosure of confidential information, which are unfounded, if you have any factual or legal basis for your objection to Dr. Wood receiving Protected Materials or serving as NS's expert in this litigation, please provide them in advance of any meet and confer so that we have a better chance of having a meaningful discussion.

Finally, we disagree that our contacting Dr. Wood was in any way improper. We understand his [REDACTED] and therefore have not made confidential disclosures related to this litigation to Dr. Wood. Therefore we do not believe his past consulting for Sarepta disqualifies him from receiving Protected Materials or serving as NS's expert in this litigation. *See, e.g., Syngenta Seeds Inc. v. Monsanto Co.*, 2004 WL 2223252 (D. Del. Sept. 27, 2004); *H. Lundbeck A/S v. Apotex Inc.*, 2020 WL 1285834 (D. Del. Mar. 18, 2020).

Shon

**Shon Lo**

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Assistant: Katie Thompson | +1.312.324.1125 | [katie.thompson@morganlewis.com](mailto:katie.thompson@morganlewis.com)

**From:** O'Quinn, Ryan <Ryan.O'Quinn@finnegan.com>

**Sent:** Friday, June 2, 2023 6:26 AM

**To:** Lo, Shon <shon.lo@morganlewis.com>; Dudash, Amy M. <amy.dudash@morganlewis.com>; Williamson, Amanda S. <amanda.williamson@morganlewis.com>; Betti, Ph.D., Christopher J. <christopher.betti@morganlewis.com>; Venegas, Ph.D., Krista Vink <krista.venegas@morganlewis.com>; Kraeutler, Eric <eric.kraeutler@morganlewis.com>; Doukas, Maria E. <maria.doukas@morganlewis.com>; Morishita, Jitsuro <jitsuro.morishita@morganlewis.com>; Sikora, Michael T. <michael.sikora@morganlewis.com>; Miller, Zachary D. <zachary.miller@morganlewis.com>; Hache, Ph.D., Guylaine <guylaine.hache@morganlewis.com>; NS District Court <NSDistrictCourt@morganlewis.com>

**Cc:** jblumenfeld@morrishichols.com; mdellinger@mnat.com; Lipton, Alissa <Alissa.Lipton@finnegan.com>; Lipsey, Charles <charles.lipsey@finnegan.com>; Flibbert, Michael <michael.flibbert@finnegan.com>; Clay, Aaron <Aaron.Clay@finnegan.com>; Kozikowski, John <John.Kozikowski@finnegan.com>; McCorquindale, J. Derek <Derek.McCorquindale@finnegan.com>; Raich, William <William.Raich@finnegan.com>; Lee, Yoonjin <Yoonjin.Lee@finnegan.com>; Kim, Yoonhee <Yoonhee.Kim@finnegan.com>

**Subject:** RE: Nippon Shinyaku, Ltd. v. Sarepta Therapeutics, Inc., No. 1:21-cv-01015-LPS - Disclosure of Experts

[EXTERNAL EMAIL]

Shon,

Thanks for your message. We would like to meet and confer, either during today's scheduled call or separately. The qualifications in your email ("he may still recall"; "to our knowledge") do not give us the necessary confidence about the protection of the confidential information of Sarepta and UWA.

Before the call, please give us the contact information for Dr. Wood's counsel. [REDACTED]

[REDACTED] through counsel or otherwise, to preserve [REDACTED] in the near term.

With best regards,  
Ryan

**Ryan P. O'Quinn, Ph.D.**  
Partner

Finnegan, Henderson, Farabow, Garrett & Dunner, LLP  
1875 Explorer Street, Suite 800, Reston, VA 20190-6023  
571.203.2426 | fax: 202.408.4400 | [ryan.o'quinn@finnegan.com](mailto:ryan.o'quinn@finnegan.com) | [www.finnegan.com](http://www.finnegan.com)

**FINNEGAN**

**From:** Lo, Shon <[shon.lo@morganlewis.com](mailto:shon.lo@morganlewis.com)>

**Sent:** Thursday, June 1, 2023 10:21 PM

**To:** O'Quinn, Ryan <Ryan.O'Quinn@finnegan.com>; Dudash, Amy M. <[amy.dudash@morganlewis.com](mailto:amy.dudash@morganlewis.com)>; Williamson, Amanda S. <[amanda.williamson@morganlewis.com](mailto:amanda.williamson@morganlewis.com)>; Betti, Ph.D., Christopher J. <[christopher.betti@morganlewis.com](mailto:christopher.betti@morganlewis.com)>; Venegas, Ph.D., Krista Vink <[krista.venegas@morganlewis.com](mailto:krista.venegas@morganlewis.com)>; Kraeutler, Eric <[eric.kraeutler@morganlewis.com](mailto:eric.kraeutler@morganlewis.com)>; Doukas, Maria E. <[maria.doukas@morganlewis.com](mailto:maria.doukas@morganlewis.com)>; Morishita, Jitsuro <[jitsuro.morishita@morganlewis.com](mailto:jitsuro.morishita@morganlewis.com)>; Sikora, Michael T. <[michael.sikora@morganlewis.com](mailto:michael.sikora@morganlewis.com)>; Miller, Zachary D. <[zachary.miller@morganlewis.com](mailto:zachary.miller@morganlewis.com)>; Hache, Ph.D., Guylaine <[guylaine.hache@morganlewis.com](mailto:guylaine.hache@morganlewis.com)>; NS District Court <[NSDistrictCourt@morganlewis.com](mailto:NSDistrictCourt@morganlewis.com)>

**Cc:** jblumenfeld@morrishichols.com; mdellinger@mnat.com; Lipton, Alissa <[Alissa.Lipton@finnegan.com](mailto:Alissa.Lipton@finnegan.com)>; Lipsey, Charles <[charles.lipsey@finnegan.com](mailto:charles.lipsey@finnegan.com)>; Flibbert, Michael <[michael.flibbert@finnegan.com](mailto:michael.flibbert@finnegan.com)>; Clay, Aaron <[Aaron.Clay@finnegan.com](mailto:Aaron.Clay@finnegan.com)>; Kozikowski, John <[John.Kozikowski@finnegan.com](mailto:John.Kozikowski@finnegan.com)>; McCorquindale, J. Derek <[Derek.McCorquindale@finnegan.com](mailto:Derek.McCorquindale@finnegan.com)>; Raich, William <[William.Raich@finnegan.com](mailto:William.Raich@finnegan.com)>; Lee, Yoonjin

<Yoonjin.Lee@finnegan.com>; Kim, Yoonhee <Yoonhee.Kim@finnegan.com>

**Subject:** RE: Nippon Shinyaku, Ltd. v. Sarepta Therapeutics, Inc., No. 1:21-cv-01015-LPS - Disclosure of Experts

**EXTERNAL Email:**

Ryan,

We understand that in the last four years, Dr. Wood has held non-confidential consulting positions at Evox Therapeutics, Pepgen, Orfonyx, Isogenix, Everyone Medicines, Judo Bio, Eisai, Wave Life Sciences, and Sarepta Therapeutics (which terminated in 2020). He has not testified as an expert at deposition or trial during the preceding five years.

We have not and have no intention to induce Dr. Wood to disclose any confidential information of Sarepta or UWA that he may still recall at this point, and to our knowledge, he has not disclosed any such information to us or to NS. If you would like to meet and confer about this, we can discuss during tomorrow's call. If you would like to produce the contractual agreements referenced in your email below for our consideration, please do so.

Please be aware that Dr. Wood is represented by counsel (not us), so you should not contact him directly about this matter.

Shon

**Shon Lo**

**Morgan, Lewis & Bockius LLP**

110 North Wacker Drive | Chicago, IL 60606-1511

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[shon.lo@morganlewis.com](mailto:shon.lo@morganlewis.com) | [www.morganlewis.com](http://www.morganlewis.com)

Assistant: Katie Thompson | +1.312.324.1125 | [katie.thompson@morganlewis.com](mailto:katie.thompson@morganlewis.com)

---

**From:** O'Quinn, Ryan <Ryan.O'Quinn@finnegan.com>

**Sent:** Thursday, June 1, 2023 6:29 PM

**To:** Lo, Shon <[shon.lo@morganlewis.com](mailto:shon.lo@morganlewis.com)>; Dudash, Amy M. <[amy.dudash@morganlewis.com](mailto:amy.dudash@morganlewis.com)>; Williamson, Amanda S. <[amanda.williamson@morganlewis.com](mailto:amanda.williamson@morganlewis.com)>; Betti, Ph.D., Christopher J. <[christopher.betti@morganlewis.com](mailto:christopher.betti@morganlewis.com)>; Venegas, Ph.D., Krista Vink <[krista.venegas@morganlewis.com](mailto:krista.venegas@morganlewis.com)>; Kraeutler, Eric <[eric.kraeutler@morganlewis.com](mailto:eric.kraeutler@morganlewis.com)>; Doukas, Maria E. <[maria.doukas@morganlewis.com](mailto:maria.doukas@morganlewis.com)>; Morishita, Jitsuro <[jitsuro.morishita@morganlewis.com](mailto:jitsuro.morishita@morganlewis.com)>; Sikora, Michael T. <[michael.sikora@morganlewis.com](mailto:michael.sikora@morganlewis.com)>; Miller, Zachary D. <[zachary.miller@morganlewis.com](mailto:zachary.miller@morganlewis.com)>; Hache, Ph.D., Guylaine <[guylaine.hache@morganlewis.com](mailto:guylaine.hache@morganlewis.com)>; NS District Court <[NSDistrictCourt@morganlewis.com](mailto:NSDistrictCourt@morganlewis.com)>

**Cc:** [jblumenfeld@morrisnichols.com](mailto:jblumenfeld@morrisnichols.com); [mdellinger@mnat.com](mailto:mdellinger@mnat.com); Lipton, Alissa <[Alissa.Lipton@finnegan.com](mailto:Alissa.Lipton@finnegan.com)>; Lipsey, Charles <[charles.lipsey@finnegan.com](mailto:charles.lipsey@finnegan.com)>; Flibbert, Michael <[michael.flibbert@finnegan.com](mailto:michael.flibbert@finnegan.com)>; Clay, Aaron <[Aaron.Clay@finnegan.com](mailto:Aaron.Clay@finnegan.com)>; Kozikowski, John <[John.Kozikowski@finnegan.com](mailto:John.Kozikowski@finnegan.com)>; McCorquindale, J. Derek <[Derek.McCorquindale@finnegan.com](mailto:Derek.McCorquindale@finnegan.com)>; Raich, William <[William.Raich@finnegan.com](mailto:William.Raich@finnegan.com)>; Lee, Yoonjin <[Yoonjin.Lee@finnegan.com](mailto:Yoonjin.Lee@finnegan.com)>; Kim, Yoonhee <[Yoonhee.Kim@finnegan.com](mailto:Yoonhee.Kim@finnegan.com)>

**Subject:** RE: Nippon Shinyaku, Ltd. v. Sarepta Therapeutics, Inc., No. 1:21-cv-01015-LPS - Disclosure of Experts

[EXTERNAL EMAIL]

Counsel,

Sarepta and UWA object to NS's use of Matthew Wood as an expert in this matter. At the outset, NS's disclosure of Dr. Wood in the form of a 2-page "CV" falls well short of the requirements of Section 7.6(a) of the Protective Order, which require disclosure of "any non-confidential employment and consulting positions for the last four years" and identification of "any litigation or administrative proceeding in connection with which the Expert has offered expert testimony...during the preceding five years."

More importantly, however, as NS and Dr. Wood are undoubtedly aware, Dr. Wood [REDACTED]. While our investigation is continuing, we are aware of [REDACTED].

Any further contact with Dr. Wood by NS in this matter is improper and may expose NS, its attorneys, and Dr. Wood to sanctions and/or civil liability. Accordingly, please **immediately** confirm the following:

- Dr. Wood has not at any time disclosed confidential information of Sarepta or UWA to NS or its attorneys.
- NS has reminded Dr. Wood of [REDACTED]
- NS has not and will not induce Dr. Wood to share any Sarepta or UWA confidential information with NS or its attorneys.

To the extent you are unable or unwilling to confirm any of the above points this evening, please explain why not in writing, and provide your availability to meet and confer tomorrow or over the weekend on the issue pursuant to Sarepta filing one or more motions with the Court.

We will address the disclosures of Mssrs. Maness and Strober under separate cover.

With best regards,  
Ryan

**Ryan P. O'Quinn, Ph.D.**

Partner

Finnegan, Henderson, Farabow, Garrett & Dunner, LLP  
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**FINNEGAN**

---

**From:** Lo, Shon <[shon.lo@morganlewis.com](mailto:shon.lo@morganlewis.com)>

**Sent:** Wednesday, May 31, 2023 4:28 PM

**To:** [jblumenfeld@morrisnichols.com](mailto:jblumenfeld@morrisnichols.com); [mdellinger@mnat.com](mailto:mdellinger@mnat.com); Lipton, Alissa <[Alissa.Lipton@finnegan.com](mailto:Alissa.Lipton@finnegan.com)>; Lipsey, Charles <[charles.lipsey@finnegan.com](mailto:charles.lipsey@finnegan.com)>; Flibbert, Michael <[michael.flibbert@finnegan.com](mailto:michael.flibbert@finnegan.com)>; Clay, Aaron <[Aaron.Clay@finnegan.com](mailto:Aaron.Clay@finnegan.com)>; Kozikowski, John <[John.Kozikowski@finnegan.com](mailto:John.Kozikowski@finnegan.com)>; McCorquindale, J. Derek <[Derek.McCorquindale@finnegan.com](mailto:Derek.McCorquindale@finnegan.com)>; Raich, William <[William.Raich@finnegan.com](mailto:William.Raich@finnegan.com)>; Lee, Yoonjin <[Yoonjin.Lee@finnegan.com](mailto:Yoonjin.Lee@finnegan.com)>; Kim, Yoonhee <[Yoonhee.Kim@finnegan.com](mailto:Yoonhee.Kim@finnegan.com)>; O'Quinn, Ryan <[Ryan.O'Quinn@finnegan.com](mailto:Ryan.O'Quinn@finnegan.com)>

**Cc:** Dudash, Amy M. <[amy.dudash@morganlewis.com](mailto:amy.dudash@morganlewis.com)>; Williamson, Amanda S. <[amanda.williamson@morganlewis.com](mailto:amanda.williamson@morganlewis.com)>; Betti, Ph.D., Christopher J. <[christopher.betti@morganlewis.com](mailto:christopher.betti@morganlewis.com)>; Venegas, Ph.D., Krista Vink <[krista.venegas@morganlewis.com](mailto:krista.venegas@morganlewis.com)>; Kraeutler, Eric <[eric.kraeutler@morganlewis.com](mailto:eric.kraeutler@morganlewis.com)>; Doukas, Maria E. <[maria.doukas@morganlewis.com](mailto:maria.doukas@morganlewis.com)>; Morishita, Jitsuro <[jitsuro.morishita@morganlewis.com](mailto:jitsuro.morishita@morganlewis.com)>; Sikora, Michael T. <[michael.sikora@morganlewis.com](mailto:michael.sikora@morganlewis.com)>; Miller, Zachary D. <[zachary.miller@morganlewis.com](mailto:zachary.miller@morganlewis.com)>; Hache, Ph.D., Guylaine <[guylaine.hache@morganlewis.com](mailto:guylaine.hache@morganlewis.com)>; NS District Court <[NSDistrictCourt@morganlewis.com](mailto:NSDistrictCourt@morganlewis.com)>

**Subject:** RE: Nippon Shinyaku, Ltd. v. Sarepta Therapeutics, Inc., No. 1:21-cv-01015-LPS - Disclosure of Experts

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---

**From:** Lo, Shon <[shon.lo@morganlewis.com](mailto:shon.lo@morganlewis.com)>

**Sent:** Wednesday, May 31, 2023 3:26 PM

**To:** [jblumenfeld@morrisnichols.com](mailto:jblumenfeld@morrisnichols.com); [mdellinger@mnat.com](mailto:mdellinger@mnat.com); [alissa.lipton@finnegan.com](mailto:alissa.lipton@finnegan.com); [charles.lipsey@finnegan.com](mailto:charles.lipsey@finnegan.com); [michael.flibbert@finnegan.com](mailto:michael.flibbert@finnegan.com); [aaron.clay@finnegan.com](mailto:aaron.clay@finnegan.com); [John.Kozikowski@finnegan.com](mailto:John.Kozikowski@finnegan.com); [derek.mccorquindale@finnegan.com](mailto:derek.mccorquindale@finnegan.com); [William.raich@finnegan.com](mailto:William.raich@finnegan.com); [Yoonjin.lee@finnegan.com](mailto:Yoonjin.lee@finnegan.com); [yoonee.kim@finnegan.com](mailto:yoonee.kim@finnegan.com); [ryan.o'quinn@finnegan.com](mailto:ryan.o'quinn@finnegan.com)

**Cc:** Dudash, Amy M. <[amy.dudash@morganlewis.com](mailto:amy.dudash@morganlewis.com)>; Williamson, Amanda S.

<[amanda.williamson@morganlewis.com](mailto:amanda.williamson@morganlewis.com)>; Betti, Ph.D., Christopher J. <[christopher.betti@morganlewis.com](mailto:christopher.betti@morganlewis.com)>; Venegas, Ph.D., Krista Vink <[krista.venegas@morganlewis.com](mailto:krista.venegas@morganlewis.com)>; Kraeutler, Eric <[eric.kraeutler@morganlewis.com](mailto:eric.kraeutler@morganlewis.com)>; Doukas, Maria E. <[maria.doukas@morganlewis.com](mailto:maria.doukas@morganlewis.com)>; Morishita, Jitsuro <[jitsuro.morishita@morganlewis.com](mailto:jitsuro.morishita@morganlewis.com)>; Sikora, Michael T. <[michael.sikora@morganlewis.com](mailto:michael.sikora@morganlewis.com)>; Miller, Zachary D. <[zachary.miller@morganlewis.com](mailto:zachary.miller@morganlewis.com)>; Hache, Ph.D., Guylaine <[guylaine.hache@morganlewis.com](mailto:guylaine.hache@morganlewis.com)>; NS District Court <[NSDistrictCourt@morganlewis.com](mailto:NSDistrictCourt@morganlewis.com)>

**Subject:** Nippon Shinyaku, Ltd. v. Sarepta Therapeutics, Inc., No. 1:21-cv-01015-LPS - Disclosure of Experts

Counsel for Sarepta and UWA,

Pursuant to Section 7.6 of the Stipulated Protective Order, we hereby disclose Robert Maness, Jonathan B Strober, and Matthew JA Wood as experts to whom we plan to disclose Protected Material.

Sincerely,

Shon

**Shon Lo**

**Morgan, Lewis & Bockius LLP**

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